

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT
HUNTINGTON, WEST VIRGINIA

ROBERT A. FLAUGHER, as Administrator of the
Estate of Shahnaz Rumman,

Plaintiff,

vs.

CASE NUMBER: 3:13-cv-28460

CABELL HUNTINGTON HOSPITAL, INC.;
UNIVERSITY PHYSICIANS & SURGEONS, INC.;
MARSHALL UNIVERSITY BOARD OF GOVERNORS;
JESSICA K. GRANGER; CHRISTINE V. GUTIERREZ;
DAVID C. JUDE; RANDY S. KINNARD;
BRENDA BROWN; and Y. ALEXIS DAUGHERTY,

Defendants.

RESPONSES TO PLAINTIFF'S INTERROGATORIES BY
DEFENDANT, Y ALEXIS DAUGHERTY

Defendant, Y Alexis Daugherty by counsel, files the following responses to
Plaintiff's Interrogatories to Defendants, Brenda Brown and Y Alexis Daughtery (*sic*),
served upon this Defendant on July 18, 2014, and states as follows:

- a. The information supplied in these responses is not based solely on the knowledge of this Defendant, but includes the knowledge of the party, agents, representatives and attorneys, unless privileged.
- b. The word usage and sentence structure may be that of the attorneys assisting in the preparation of these responses and, thus, does not necessarily purport to be the precise language of this Defendant.

INTERROGATORIES

INTERROGATORY 1: Please state your full name, address, and set forth in

statement, and the present custodian of any such statements.

RESPONSE: Objection. The information requested could be protected or privileged and this request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, none known to this Defendant.

REQUEST NO. 4: If you contend that a party, or person or legal entity not a party to this action, acted in such a manner as to cause or contribute to the occurrence referenced in the Plaintiff's Complaint, then give a complete statement of facts upon which you rely to support your contention, and provide the name, address, and telephone number of any persons with personal knowledge of facts upon which you so rely.

RESPONSE: Objection, overbroad. This Defendant is not an expert witness and therefore holds no opinions in this regard.

REQUEST NO. 5: If you know the existence of any demonstrative evidence, picture, movies, computer generated evidence, electronically stored data, power point presentations, videotapes, diagrams, x-rays, documents, radiology studies, reports, or objects (real evidence) relative to the occurrence or the issue of damages, state the nature, subject matter, date produced or obtained, and the name and address of the present custodian of each. RESPONSE: None known to this Defendant beyond the medical records.

REQUEST NO. 6: Set forth in detail the following information pertaining to all policies or agreements of liability insurance covering or pertaining to acts or omissions committed by or on your behalf as a result of providing health care services at the time of the occurrence referenced in the Plaintiff's Complaint, designating which, if any, are

pertaining to Dr. Rumman's hospitalization at Cabell Huntington Hospital, and please state the general content of the testimony you anticipate obtaining from each witness.

RESPONSE: This Defendant is a fact witness and will not be discussing facts or testimony with any other witnesses.

REQUEST NO. 25: Did you ever speak with any of Dr. Rumman's medical colleagues, family members, or friends who were present at Cabell Huntington Hospital about Dr. Rumman's status, condition, and/or prognosis? If so, please identify the individuals with whom you spoke and explain the nature of your conversation (*i.e.*, what you said to him/her and what he/she said to you), and the dates and times these conversations took place. If you are unable to identify Dr. Rumman's medical colleagues, family members, or by name, please provide a physical description of individual(s).

RESPONSE: This Defendant does not recall any specific discussions, but reserves the right to supplement this interrogatory as discovery progresses.

Y ALEXIS DAUGHERTY

By: /s/ Rebecca C. Brown

Of Counsel

Thomas L. Craig (WV 859)
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he/she served the foregoing

RESPONSES TO PLAINTIFF'S INTERROGATORIES BY DEFENDANT, Y

ALEXIS DAUGHERTY'S on counsel named below via electronic filing and by depositing
a true copy thereof in the United States mail, postage prepaid at Huntington, West Virginia
on the 28th day of August, 2014, addressed as follows:

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Randy S. Kinnard

Y ALEXIS DAUGHERTY

By: /s/ Rebecca C. Brown
Of Counsel

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